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August 17, 2020

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire Chief Clerk & Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

RE: Procedural Schedules in Annual Fuel Proceedings

DOCKET NO. 2005-83-A

Dear Ms. Boyd:

This letter is to inform the Public Service Commission ("Commission") that the Office of Regulatory Staff ("ORS") intends to participate in the Forum regarding the above referenced matter scheduled for Tuesday, August 25th.

ORS provides the following comments with regards to possible modifications to the procedural schedules in the Commission's annual fuel proceedings.

For the past several years ORS has typically issued discovery to the respective electric utility the day after the review period ends for historical information. ORS then also serves additional discovery that is due in conjunction with the filing of the Company's direct testimony regarding the utilities forecast. This procedure gives ORS approximately three weeks to analyze the forecast and make recommendations to the Commission in ORS direct testimony. ORS has observed that other intervening parties appear to choose to not issue discovery until well after the respective review period is over.

ORS believes that additional time between the deadline for the filing of direct testimony by the utilities and the deadline for filing of direct testimony by ORS and Intervenors would be beneficial to this agency and other Intervenors. There is an inherent balance between the electric utilities filing as early as possible and the availability of the most current commodity information on the utility's forecast. An earlier filing would produce more "out-of-date" information in the forecast. Despite ORS' belief that an adjustment in the current schedules is not absolutely necessary, we believe that an additional week between the Utility's direct testimony filing date and ORS/Intervenor direct testimony dates could be beneficial to all parties. Providing this extra

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week would give ORS and other Intervenors four weeks as compared to the current time allotment of three weeks. This can be an important difference if there is significant back and forth between the Utility and other parties after the filing of Company testimony. Providing this additional week would allow for ORS to give more time to the Utilities to provide discovery responses while also providing ORS and other Intervenors additional time to analyze those responses.

Regarding the time between the filing of Company rebuttal and ORS/Intervenor surrebuttal testimonies, ORS believes that the time allotted in the current schedules is sufficient. All parties should know the issues and be aware of what points will be made in rebuttal testimony. The issues, although unique from case to case, seldom vary significantly.

Finally, ORS believes that the current schedules provide the Commission with sufficient time to review all matters in the fuel hearings and issue an order in a timely manner. Even with the additional matters that are now involved in these annual proceedings, ORS does not believe that the schedules need significant adjustments.

Sincerely,

effrey M. Nelson

cc: All Parties of Record (via e-mail)
David Butler, Esquire (via e-mail)